

Exhibit A

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Plaintiff¹	General Tort Law Principles	<i>Heiser</i> Framework	Damage Award
<i>Spouse</i>			
Karen Goldberg*	\$200,000-\$1,200,000 ²	\$8,000,000 ³	\$13,000,000
Henna Waldman	\$5,000-\$80,000 ⁴	\$4,000,000	\$2,500,000
<i>Parent⁵</i>			
Robert L. Coulter Sr.*	\$630,000-\$680,000	\$5,000,000	\$7,500,000
Nevenka Gritz*	\$630,000-\$680,000	\$5,000,000	\$10,000,000
Richard Blutstein*	\$630,000-\$680,000	\$5,000,000	\$6,000,000
Larry Carter*	\$630,000-\$680,000	\$5,000,000	\$6,500,000
Katherine Baker*	\$630,000-\$680,000	\$5,000,000	\$6,000,000
Leonard Mandelkorn	\$0	\$2,500,000	\$10,000,000
Elise Gould	\$0	\$2,500,000	\$3,000,000
Ronald Gould	\$0	\$2,500,000	\$3,000,000
Morris Waldman	\$0	\$2,500,000	\$2,500,000

¹ An asterisk designates that the victim died in the attack.

² *In re Air Crash near Nantucket Island*, 462 F. Supp. 2d 360, 368-369 (E.D.N.Y. 2006).

³ The most analogous FSIA damages award to Mrs. Goldberg's, whose husband died in a bus bombing, is \$8 million awarded to the wife of a victim in a bus bombing in *Weinstein v. Islamic Republic of Iran*, 184 F. Supp. 2d 13, 23 (D.D.C. 2002).

⁴ Henna Waldman was awarded \$2.5 million because her husband Shmuel Waldman, who survived, was shot in the leg. *See, e.g., Goldstein v. United States*, 9 F. Supp. 2d 175, 190 (E.D.N.Y. 1998)(noting jury award of \$80,000 for spouse of victim who sustained "a fractured knee with torn ligaments and psychological injury"); *Dixon v. Aragona*, 87-cv-1347, 1992 U.S. Dist. LEXIS 6735 (N.D.N.Y. May 9, 1992)(finding as reasonable an award of \$5,000 to the spouse of a victim who suffered a broken leg).

⁵ *In re Air Crash near Nantucket Island*, 462 F. Supp. 2d at 368 (surveying other damages awards before deciding to award a father \$630,000 and a mother \$680,000 in non-economic damages).

Plaintiff	General Tort Law Principles	<i>Heiser</i> Framework	Damage Award
<i>Child</i>			
Chana Goldberg*	\$75,000-\$200,000	\$5,000,000	\$8,000,000
Esther Goldberg*	\$75,000-\$200,000	\$5,000,000	\$8,000,000
Yitzhak Goldberg*	\$75,000-\$200,000	\$5,000,000	\$6,000,000
Eliezer Goldberg*	\$75,000-\$200,000	\$5,000,000	\$4,000,000
Shoshana Goldberg*	\$75,000-\$200,000	\$5,000,000	\$4,000,000
Tzvi Goldberg*	\$75,000 ⁷	\$5,000,000	\$2,000,000
Yaakov Goldberg*	\$75,000	\$5,000,000	\$2,000,000
Binyamin Bauer	\$0	\$2,500,000	\$1,000,000
Daniel Bauer	\$0	\$2,500,000	\$1,000,000
Yehuda Bauer	\$0	\$2,500,000	\$1,000,000
<i>Sibling</i>			
Robert L. Coulter Jr. *	\$125,000 ⁸	\$2,500,000	\$3,000,000
Rebekah Blutstein*	\$125,000	\$2,500,000	\$4,000,000
Diane Coulter Miller*	\$125,000	\$2,500,000	\$3,000,000
Shaun Choffel	\$0	\$2,500,000	\$1,500,000
Jessica Rine	\$0	\$1,250,000	\$3,000,000
Elana Sokolow	\$0	\$1,250,000	\$2,500,000

⁶ *Shu-Tao Lin*, 742 F.2d at 48-52 (lower court recalculated damages *de novo* based on a “properly functioning jury -- one not misled by the prejudicial evidence presented in this trial” and determined that an appropriate award for the loss of a father’s nurture, care and guidance as a result of his death is \$100,000 per child, but Second Circuit found that recalculation to be improper in light of other awards for loss of nurture approximating \$75,000); *id.* at 52 (also noting a “jury award of \$150,000 for loss of nurture reduced to \$75,000”); *In re Air Crash near Nantucket Island*, 462 F. Supp. 2d at 368.

⁷ *Shu-Tao Lin*, 742 F.2d at 52 (citing case in which \$75,000 was awarded for infant's loss of nurture).

⁸ *In re Air Crash near Nantucket Island*, 462 F. Supp. 2d at 370.